ATTACHMENT 10

PROCESS INFORMATION

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Attachment 10 of this permit application is being submitted in accordance with UAC R315-3-2.6 through UAC R315-3-2.17. This attachment provides detailed plans and specifications of the Ashland Clearfield facility. Engineering plans and specifications are prepared under the supervision of and sealed by a Registered Professional Engineer. Overall dimensions and materials of construction are included. This attachment also identifies process information for the storage of waste in the hazardous container storage unit (CSU). Ashland stores customer and plant generated wastes in containers in this area until a truckload or partial truckload quantity is accumulated for shipment to a reclamation or permitted TSDF.

In addition, in accordance with UAC R315-3-2.5(b) (8), this section includes a description of procedures, structures, or equipment used at the facility to:

- Prevent hazards in unloading operations, for example, ramps, special forklifts;
- Prevent run-off from hazardous waste handling areas to other areas of the facility or environment, or to prevent flooding, for example, berms, dikes, trenches;
- Prevent contamination of water supplies;
- Mitigate effects of equipment failure and power outages;
- Prevent undue exposure of personnel to hazardous waste, for example, protective clothing; and
- Prevent releases to the atmosphere.

1.0 CONTAINERS
[40 CFR 270.15 and 264.170; UAC R315-3-2.6, R315-3-2.5(b)(8)]

Containers used for storage of hazardous wastes at this facility are portable containers that meet the requirements of the DOT. The layouts of the hazardous waste storage areas are shown in Appendix A of Attachment 12 of the permit application.

1.1 Containers with Free Liquids
[40 CFR 270.15; 264.175(a), (b)]

Hazardous wastes that may be stored at this facility are listed in Part A of this permit application. The chemical and physical characteristics of these wastes are described in Attachment 1. These hazardous wastes may contain free liquids; therefore, the CSU is designed for containers containing free liquids.

Wastes are stored in the CSU at the facility. The CSU is made up of four distinct storage areas. Storage Area 1 is curbed into one bay, and Storage Areas 2, 3, and 4 are curbed separately in one bay. Storage Areas 2, 3, and 4 has a total capacity of 32,560 gallons, equivalent to 592 - 55 gallon drums. Storage Area 1 has a total capacity of 2,300 gallons, equivalent to 32 - 55 gallon drums. Storage areas 2, 3, and 4 are located north of the tank farm, and Storage area 1 is located east of the tank

farm. Waste storage areas are concrete curbed areas, and meet the requirements for secondary containment. The storage areas are under roof. The locations of the storage areas are shown in Attachment 12.

The CSU is designed to permit the storage of containerized wastes on pallets. Containers may be stacked two high maximum. The maximum volume of containerized hazardous waste which is allowed to be in storage at any one time is 32,560 gallons (equivalent to 592, 55-gallon drums) in containers that meet U.S. DOT requirements.

Most of the containers stored in the CSU will be 55-gallon drums. However, to facilitate operations, it is necessary for Ashland to be able to store wastes in containers other than 55-gallon drums. Because the types of containers to be stored will vary, it is not possible to provide a maximum number of each type of container to be stored in the CSU. However, in no way will we exceed the storage capacity of our storage areas.

The CSU has concrete containment curbs on three sides. The fourth side is ramped to allow the forklifts to move in and out of the storage areas. All movement of containers in and out of the storage areas occurs from the ramped side. This procedure is reversed when the drums are removed from the container storage area for shipment to the disposal or reclamation facility. The width of each pallet supporting waste containers is four feet, which is also the width of the forklift used to move palleted waste in and out of each storage area. This aisle space is adequate for inspections, equipment maneuvering and container handling, since all container handling is conducted from the ramped side of the storage area. The containers are inspected in accordance with the Waste Analysis Plan as the containers are unloaded from the trucks.

When a section of the container storage areas is emptied, it is inspected. Spilled or leaked material is absorbed or neutralized, and the area is cleaned promptly; therefore, any storage area and/or bay can be used for a particular waste type. This ensures that incompatible wastes will not come into contact with any spilled or leaked material. Container labels identify the waste types within the storage area at a particular time.

The basis for determining which wastes will be stored in a particular storage area is the known chemical and physical properties of the wastes. This information is obtained from the data, which the generator supplies on the Waste Material Profile Sheet (WMPS). This information is confirmed by the waste analyses, which may be performed by the generator at the time that the waste stream is initially qualified for acceptance. Shipments of waste are recorded on a RCRA Operating Log, which is maintained to track each waste shipment received at the facility. A copy of the log is provided in Appendix D of Attachment 1. The number and weight of containers accepted at the site is obtained from the accompanying manifests, rather than a scale, and is recorded on the log.

The facility meets the requirements for separation of incompatible wastes as specified in 40 CFR Part 264, Subpart I. Wastes containers are elevated from the floor via pallets or other means, and the storage areas allow for segregation of incompatible waste types. Facility personnel are trained to separate acid/caustic corrosives and cyanide-containing waste from corrosives, for example. Also, solvent wastes are stored separately from corrosive wastes. Wastes are stored, and segregated if necessary, in accordance with the compatibility guidance included in Appendix A of Attachment 1.

1.1.1 Description of Containers
[40 CFR 270.14(b)(1); 264.171, 264.172; UAC R315-8-9]

The containers that are used for a particular waste must meet DOT requirements for the appropriate hazard. Facility personnel responsible for shipping and receiving hazardous waste containers are trained to inspect the containers to assure compliance. A list of container types that may be received at the facility is included as Table 1 in this section. Container labeling requirements are satisfied by following DOT requirements (Title 49 CFR).

1.1.2 Container Management Plan
[40 CFR 270.14(a); 264.173, R315-3-2.5(b)(8)(i), R315-8-9]

Hazardous waste containers are always kept closed when in storage. Customer wastes are not opened. The exception is if a container holding hazardous waste is not in good condition or if it begins to leak, the waste is transferred to a container that is in good condition or placed in an approved overpack drum. This facility serves only as temporary storage for customer generated wastes. Hazardous waste containers are marked with hazardous waste labels and labeled with the appropriate DOT hazard labels.

The hazardous waste CSU is inspected weekly to ensure that containers are stored in a manner to prevent ruptures and leaks. Each storage area within the CSU is inspected to verify that containers are properly placed. An inspection schedule is included in Table 1 of Attachment 3 and an inspection log form is in Appendix A of Attachment 3.

Table 1
TYPICAL CONTAINER TYPES USED FOR HAZARDOUS WASTE STORAGE

Type/DOT Spec.[1]	Container Capacity	Container Construction Material
Small drums	5-gallon to 30-gallon	Metal (lined/unlined), polyethylene, fiber, stainless steel composite
Drums	55-gallon	Metal (lined/unlined), polyethylene, fiber, stainless steel composite
Portable tanks	100 gallons to 550 gallons	Carbon steel metal, stainless steel metal, wirebound-polyethylene liner, polyethylene, aluminum, poly-steel, metal (lined/unlined)
IBC[2]	Flexible Intermediate Bulk Containers: various sizes ('SuperSacs') 12 cu. ft. to 250 cu. ft.	Coated fabric
Boxes	Corrugated cartons: Various sizes up to l500 pounds capacity	Fiberboard
Bags	Multi Walled Kraft Bags: Various sizes up to 100 pounds capacity	Fiber (lined/unlined), paper (lined/unlined), polyethylene/aluminum lined, plastic
Miscellaneous	Misc. containers: 1-pint to 5-gallons	Metal (lined/unlined), glass (lined/unlined), plastic, polyethylene composite

[1] All containers and liners used to manage hazardous wastes meet U.S. DOT specifications.
[2.] No free liquid waste will be accepted in this type of container.

Containers are not opened, handled, or stored in a manner that may rupture the container or cause it to leak. Containers may be stacked two high in the storage areas, which ensures stability. Containers are placed in storage with adequate aisle spacing maintained between rows of containers, which ensures safe management and access for purposes of inspection, containment, and remedial action with emergency vehicles. The storage configuration is depicted in Appendix A of Attachment 12 of this permit application.

Ashland stores all containers on pallets, or on their own self-contained legs. The storage areas are away from sources of ignition. All ignitable wastes stored at this facility are compatible. All storage areas are located more than 60 feet from the nearest property line. Containers of incompatible wastes are segregated. Only wastes that are compatible with each other will be stored within a storage area in the curbed storage area. No reactive or explosive wastes are accepted at this facility. The maximum number of drums expected to be in storage at any one time is 32,560 gallons (equivalent to 592, 55-gallon drums).

Containers are moved and handled with forklift trucks, drum dollies, and or pallet jacks and are operated by trained Ashland personnel.

Procedures for Handling of Containers within the Facility

The facility generates very little waste in containers. However, if a container of waste is generated it will be labeled and moved to the CSU. Prior to movement, the container will be inspected to ensure it is not leaking and that all bungs are in place and secure. The container will then be moved by fork truck or hand truck to the CSU. The grid location within the storage area is then recorded. The procedures outlined in the waste analysis plan for the incoming waste will be adhered to for all incoming shipments of hazardous waste. Similar procedures are followed when a load of hazardous waste is shipped to the TSDF for ultimate disposal. The applicable procedures described above in the procedures for moving containers within the container storage area will also be followed when containers are moved within the facility.

Management Practices for Locating Specific Containers of Waste At The Facility

All containers of waste will be stored within the permitted CSU, and will be located by means of the grid system shown on the container storage area configuration drawing in Appendix A of Attachment 12. Each pallet of containers will be given a grid location consisting of a letter and number (e.g., A5). The letter and number system is laid out on the container

configuration drawing. The letters rows run length wise and start with row A. Additional rows will then be designated as B, C, etc. increasing alphabetically as necessary. The number rows will run across the cell starting with row 1 and increasing sequentially. Therefore, any container can be located by knowing the grid location which will be kept for all containers of hazardous waste.

1.1.3 Secondary Containment System Design and Operation [40 CFR 270.15(a)(1), 264.175(a), (d); R315-8-9.6]

The CSU is equipped with a concrete floor that is approximately 6-inches thick. The design of the storage areas is provided in Attachment 13. A total of 12,320 gallons maximum can be stored in Storage Area 2; 9,240 each in Storage Ares 3 and 4; and 1,760 in Storage Area 1. The total area of Storage Areas 2, 3, and 4 is 1,824 square feet, and the total area of Storage Area 1 is 2,280 square feet. The storage areas allow for easy access for forklift trucks. With containers stacked two high, the waste CSU has adequate space for at least 10 percent of the maximum storage amount.

The capacity of the secondary containment system is calculated as shown below.

The CSU for the storage area has sufficient capacity to contain a spill from the largest container to be stored in the area, or 10% of the volume of the stored containers, whichever is greater. The calculations which provide supporting data and conclusions for the secondary containment capacity are included below in Section 1.1.3(c). Storage area bases and curbs will be maintained free of cracks or gaps.

To ensure that the containment system is impervious to spills and leaks, a top coating has been applied to the concrete surface of the existing container pad and curbing. The sealant is compatible with all wastes which are stored in the CSU. Technical information and specifications for the specific material are contained in Attachment 12.

(a) *Requirement for the Base or Liner to Contain Liquids* [40 CFR 270.15; 264.175(b)(1)]

The hazardous waste CSU at the facility has an approximately 6-inch thick poured concrete base. The base is of sufficient thickness and material to prevent container spills and leaks from migrating out of the storage areas. The base of the CSU is also is free of cracks and gaps so that it is sufficiently impervious to contained materials, until such time as the accumulated material is detected and removed. In addition, Storage Area 1 is coated. The coating materials used are designed to resist impact, chemicals, and abrasion. As a matter of

training and practice, any leak or spill is contained and cleaned up immediately upon discovery.

Storage Areas 2, 3, and 4 are under cover, including an over hang, to prevent rainfall or other precipitation from adversely impacting the storage area. Storage Area 1 is fenced in and has slats to minimize impact from rainwater. If there is no hazardous waste stored in the area, and there is no evidence of spills or leaks, the water will be treated as uncontaminated rain water. If there is reason to believe it may be contaminated, it will be received with absorption pads, and placed in a drum for shipment to a permitted TSD facility.

(b) ***Containment System Drainage***
[40 CFR 270.15(a)(2), 264.175(b)(2)]

The waste containers are stored on pallets, or on the container's legs, to elevate the containers above the floor, thereby protecting the bottoms of the containers from contact with any accumulated liquids within the storage area.

(c) ***Containment System Capacity***
[40 CFR 270.15(a)(3), 264.175(b)(3)]

CSU - Storage Area 1 - Hazardous Waste Storage Area Capacity and Containment

Capacity:

4 pallets x 2 high = 8 pallets x 4 drums/pallet = 32 drums
32 dr x 55 gal = 1,760 gal

Secondary containment:

28.5 ft x 6.5 ft = 185.25 sq ft x 0.167 ft ht = 30.9 cu. ft.
30.9 cu. ft. x 7.48 gal/cu. ft. = 231.1 gallons

Pallet displacement:
= 4 pallets x 1.3 cu. ft./pallet
= 5.2 cu. ft. x 7.48 gal/cu. ft.
= 38.9 gallons

Ramp Displacement:
3.5 ft. x 6.5 ft x .0833 ft. = 1.896 cu. ft.
1.896 cu.ft. x 7.48 gal = 14.2 gallons

Net containment = 231.1 - 38.9 -14.2 =178.5 gallons

10% of 1760 gallons is 176 gallons, therefore there is adequate containment.

CSU - Storage Areas 2, 3, and 4 - Hazardous Waste Storage Area Capacity and Containment

Storage Area 2

Capacity:

7 pallets/row x 4 rows = 28 pallets x 2 high = 56 pallets
56 pallets x 4 dr/pallet = 224 drums
224 drums x 55 gallons = 12,320 gallons

Secondary containment capacity:
23.5 ft. wide x 28 ft. long x 0.5 ft. curb = 329 cu. ft.
329 cu. ft. x 7.48 gal/cu. ft. = 2461 gal

Plus Ramp Area(1) = 4 ft x 23.5 ft. x 0.25 (avg. hgt.) = 23.5 cu. ft.
23.5 cu. ft. x 7.48 gal/cu. ft. = 175 gallons

Minus pallet displacement(1) 28 pallets x 2.6 cu. ft. = 72.8 cu. ft.
72.8 cu. ft. x 7.48 gal/cu. ft. = 545 gal

2461 + 175 - 545 gal = 2091 gallons containment
10% of 12,320 gallons = 1232 gallons, therefore containment is adequate.

Storage Areas 3 & 4

Capacity (each):

7 pallets x 3 rows = 21 pallets x 2 high = 42 pallets
42 pallets x 4 dr/pallet = 168 drums
168 drums x 55 gal/drum = 9240 gallons

Secondary Containment Capacity (each)
17 ft. wide x 28 ft. long x 0.5 ft. curb = 238 cu. ft.
238 cu. ft. x 7.48 gal/cu. ft. = 1780 gallons

Plus Ramp Area (each) = 4 ft. x 17 ft. x 0.25 = 17 cu. ft.
17 cu. ft. x 7.48 gal/cu. ft. = 127 gallons

Minus pallet displacement (2&3) 21 pallets x 2.6 cu. ft. = 54.6 cu. ft.

54.6 cu. ft. x 7.48 gal/cu. ft. = 408 gal

1780 + 127 - 408 gal = 1499 gallons containment (each cell)
10% of 9240 gallons = 924 gallons, therefore containment is adequate.

(d) ***Control of Run-On***
[40 CFR 270.15(a)(4), 264.175(b)(4); R315-3-2.5(b)(8)(ii) and (iii)]

The waste CSU is covered with a roof canopy and curbed and ramped to prevent run-on from occurring.

(e) ***Removal of Liquids from Containment System***
[40 CFR 270.15(a)(5), 264.175(b)(5)]

Inspections of the CSU are recorded on a weekly basis. In addition, the facility maintains a spill control plan for removing spilled liquids. Any liquid spill or leak is cleaned up immediately on discovery. A leaking container is placed in a recovery or overpack container. Spills are neutralized or absorbed with material kept in inventory for that purpose.

Spilled material is transferred to containers that are compatible with the spilled material and that meet DOT requirements for the hazard represented. The spilled material is transported off-site for disposal at a permitted treatment, storage, or disposal facility.

Based on the design of the storage area, Ashland does not anticipate an excessive amount of accumulated moisture. Storage areas 2, 3, and 4 are equipped with a roof. Storage area 1 is equipped with a roof and fence and slats on one side. All of the storage areas are surrounded by a curb which significantly reduces the amount of precipitation that enters the storage area. Any significant moisture accumulation will be evaluated to determine if it is hazardous. If there is no hazardous waste stored in the area, and there is no evidence of spills or leaks, the water will be treated as uncontaminated rain water. If there is reason to believe it may be contaminated, it will be received with absorption pads, and placed in a drum for shipment to a permitted TSD facility.

1.1.4 Containers Without Free Liquids

All hazardous waste containers stored at the facility are handled as though they may contain free liquids. These containers are stored in the hazardous waste CSU, which is designed for containers with free liquids.

2.0 TANK SYSTEMS
[40 CFR 270.16; 264.191 through 264.194, R315-3-2.7]

Hazardous wastes are not managed in tank systems at this facility.

3.0 WASTE PILES
[40 CFR 270.18; 264.250 through 264.259, R315-3-2.9]

Hazardous wastes are not managed in waste piles at this facility.

4.0 SURFACE IMPOUNDMENTS
[40 CFR 264.220 through 264.232, R315-3-2.8]

Hazardous wastes are not managed in surface impoundments at this facility.

5.0 INCINERATORS
[40 CFR 270.19, 264.340; 264.351, R315-3-2.10]

Hazardous wastes are not treated in incinerators at this facility.

6.0 LANDFILLS
[40 CFR 270.21; 264.300 through 264.317, R315-3-2.12]

Hazardous wastes are not disposed of in landfills at this facility.

7.0 LAND TREATMENT
[40 CFR 270.20; 264.270 through 264.283, R315-3-2.11]

Hazardous wastes are not managed in land treatment units at this facility.

8.0 MISCELLANEOUS UNITS
[40 CFR 270.23; 264.601, R315-3-2.14]

Hazardous wastes are not managed in miscellaneous units at this facility.

9.0 BOILERS AND INDUSTRIAL FURNACES (BIF)
[40 CFR 270.22, R315-3-2.13]

Hazardous wastes are not managed in boilers or industrial furnaces at this facility.

10.0 CONTAINMENT BUILDINGS
[40 CFR 270.14(a), (b); 264.1100 thorough 264.1102]

Hazardous wastes are not managed in containment buildings at this facility.

11.0 DRIP PADS
[40 CFR 270.26, 264.570 through 264.575, R315-3-2.17]

Hazardous wastes are not managed on drip pads at this facility.

APPENDIX A

SUBPART CC AIR EMISSION STANDARDS

Appendix A
SUPART CC AIR EMISSION STANDARDS

Each container opening will be maintained in a closed position at all times except when it is necessary to use the opening to add, remove, inspect, or sample the material in the container.

1.0 APPLICABILITY
[40 CFR 270.14(a), 270.27, 264.1080(a) through (d); UAC R315-3-2.18]

The standards of 40 CFR 264, Subpart CC apply to the Ashland Clearfield facility because the facility stores hazardous wastes in containers, and is subject to 40 CFR 264, Subpart I, relating to the Use and Management of Containers. The facility does not use tanks or surface impoundments for the management of hazardous waste.

2.0 EXEMPTIONS
[40 CFR 270.14(a), 270.27, 264.1082(c)]

Ashland is not pursuing an exemption from the Subpart CC regulations.

3.0 WASTE DETERMINATION PROCEDURES
[40 CFR 270.14(a), 270.27, 264.1083, 265.1084]

Waste determination procedures do not apply to this facility because an exemption from the Subpart CC regulations is not being pursued.

4.0 STANDARDS FOR TANKS
[40 CFR 270.14(a), 270.27, 264.1084(b)(1) and (2)]

No hazardous waste is stored in tanks at this facility.

5.0 STANDARDS FOR SURFACE IMPOUNDMENTS
[40 CFR 270.14(a), 270.27, 264.1085(b)-(d)]

No surface impoundments are utilized at this facility.

6.0 STANDARDS FOR CONTAINERS – LEVELS 1, 2, AND 3 [40 CFR 270.14(a), 270.27, 264.1086]

Ashland stores waste containers that are in light and non-light material services and are required to meet Level 1 and 2 controls in accordance with 40 CFR 264.1086(b)(1)(i-iii).

6.1 Container Level 1 Standards Apply to: [40 CFR 270.14(a), 270.27, 264.1086(b)(1)]

6.1.1 Container with Design Capacity Greater than 0.1 m3 and less than or Equal to 0.46.m3 [40 CFR 270.14(a), 270.27, 264.1086(b)(1)(i)]

Hazardous wastes are stored in containers that have a design capacity of greater than 0.1 m3 and less than or equal to 0.46.m3.

6.1.2 Container with Design Capacity Greater than 0.46m3 that is not in Light Material Service [40 CFR 270.14(a), 270.27, 264.1086(b)(1)(ii)]

Hazardous wastes are stored in containers with a design capacity of greater than 0.46m3 that are not in light material service.

6.2 Container Level 2 Standards Apply to Container with a Design Capacity Greater than 0.46 m3 that is in Light Material Service [40 CFR 270.14(a), 270.27, 264.1086(b)(1)(iii)]

Hazardous wastes are stored in containers with a design capacity greater than 0.46 m3 that are in light material service.

6.3. Container Level 3 Standards Apply to Container with Design Capacity Greater than 0.1 m3 that is Used for Stabilization [40 CFR 270.14(a), 270.27, 264.1086(b)(2)]

Ashland does not use any containers for the treatment of hazardous waste by a waste stabilization process; therefore, Container Level 3 standards do not apply.

7.0 IDENTIFICATION OF EACH CONTAINER AREA SUBJECT TO SUBPART CC [40 CFR 270.27(a)(2)]

7.1. Container Level 1 [40 CFR 270.27(a)(2), 264.1086(c)(1)]

7.1.1 Container that Meets Department of Transportation Regulations on Packaging
[40 CFR 270.27(a)(2), 264.1086(c)(1)(i) and (f)]

In order to comply with Level 1 control standards, the facility only accepts waste in containers that meet DOT regulations on packaging hazardous materials as specified in 40 CFR 264.1086(f).

7.1.2 Container Equipped with Cover and Closure Devices
[40 CFR 270.27(a)(2), 264.1086(c)(1)(ii) and (2)]

Containers are equipped with closure devices, such as lids, that are composed of suitable materials to minimize exposure of the hazardous waste to the atmosphere and that maintain equipment integrity. The closure device forms a continuous barrier over the container opening so that when closed, there are no visible holes, gaps, or other open spaces into the interior of the container.

7.1.3 Open-Top Container Equipped with Organic-Vapor Suppressing Barrier
[40 CFR 270.27(a)(2), 264.1086(c)(1)(ii) and (2)]

The facility does not accept open-top containers; therefore, this section is not applicable.

7.2 Container Level 2
[40 CFR 270.27(a)(e), 264.1086(d)(1)(f) and (g)]

In order to comply with Level 2 standards, the facility only accepts waste in containers that meet DOT regulations on packaging hazardous materials as specified in 40 CFR 264.1086(f). Containers are equipped with closure devices, such as lids, that are composed of suitable materials to minimize exposure of the hazardous waste to the atmosphere and maintain equipment integrity. The closure device forms a continuous barrier over or around the container opening so that when closed, there are no visible holes, gaps, or other open spaces into the interior of the container.

7.3 Container Level 3
[40 CFR 270.27(a)(2), 264.1086(e)(1) and (2)]

The facility does not store hazardous wastes in containers subject to Level 3 controls.

8.0 CONTAINER COVER AND CLOSURE DEVICES [40 CFR 270.14(a), 270.27(a)(2), 264.1086]

8.1 Container Level 1 [40 CFR 270.27(a)(2), 264.1086(c)(3) and (4)]

Waste containers are always kept closed when in storage. The driver inspects the containers and their cover and closure devices at the time of pick-up, and inspects the containers to verify that they are intact. Trailers arriving at the Clearfield facility with hazardous waste containers for storage will be unloaded onto a loading dock. Facility personnel visually inspect the containers to ensure they are properly labeled and intact, before moving them to the hazardous waste CSU. The hazardous waste CSU is inspected weekly to ensure that containers are stored in a manner to prevent ruptures and leaks.

When a defect is detected for the container, the first efforts to repair the defect will begin no later than 24 hours after detection, and the repair will be completed as soon as possible, but no later than 5 calendar days after the detection. If the repair of a defect cannot be completed within 5 days, then the defective container will be transferred to a new overpack container.

8.2 Container Level 2 [40 CFR 270.14(a), 270.27, 264.1086(d)(2) and (3)]

Waste containers are always kept closed when in storage. No transfer, commingling, blending, repackaging (closed drums are sometimes placed in over packs), or other waste management activities occur at the Ashland Clearfield facility. The driver inspects the containers and their cover and closure devices at the time of pick-up. The driver inspects the containers to verify that they are intact. Trailers arriving at the Clearfield facility with hazardous waste containers for storage will be unloaded onto a loading dock. Facility personnel visually inspect the containers to ensure they are properly labeled and intact, before moving them to the hazardous waste CSU. The hazardous waste CSU is Inspected weekly to ensure that containers are stored in a manner to prevent ruptures and leaks.

When a defect is detected for the container, cover, or closure device, the first efforts to repair the defect will begin no later than 24 hours after detection, and the repair will be completed as soon as possible, but no later than 5 calendar days after the detection. If the repair of a defect cannot be completed within 5 days, then the defective container will be transferred to a new over pack container.

8.3 Container Level 3
[40 CFR 270.14(a); 270.27; 264.1086(e)(3), (4), and (5)]

The facility does not store hazardous wastes in containers using Level 3 controls.

9.0 STANDARDS FOR CLOSED-VENT SYSTEMS AND CONTROL DEVICES
[40 CFR 270.14(a), 270.27, 264.1087]

The facility only manages Level 1 or 2 containers and does not utilize a closed vent system or control device.

10.0 CLOSED-VENT SYSTEMS AND CONTROL DEVICES
[40 CFR 270.27(a)(5), 264.1087(c)(1)]

The facility only manages Level 1 or 2 containers and does not utilize a closed vent system or control device.

11.0 INSPECTION AND MONITORING REQUIREMENTS
[40 CFR 270.27, 264.1088]

The facility does not store hazardous wastes in tanks or surface impoundments. The facility will inspect Level 1 or 2 containers as specified above. These inspections are incorporated into the facility inspection plan required by 40 CFR 264.15, which is included in Attachment 3 of this application.

12.0 RECORDKEEPING REQUIREMENTS
[40 CFR 270.27, 264.1089]

The facility only manages Level 1 or 2 containers and does not utilize a closed vent system or control device. Container inspections are documented on inspection logs and are maintained at the facility for at least three years from the time of inspection.